

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

**STIPULATION FOR AN ORDER GRANTING JUAN HALL
AN ALLOWED UNSECURED CONVENIENCE CLAIM
IN THE AMOUNT OF \$25,000**

The City of Detroit, Michigan (“City”), the Detroit Police Officers Association (“DPOA”) and Juan Hall (“Hall”) (collectively the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, the Parties were parties to a grievance proceeding – DPOA Grievance No. 09-040 – involving a claim by DPOA member Hall for compensation (the “Hall Claim”); and

WHEREAS, on July 18, 2013 (the “Petition Date”), the City commenced this case under chapter 9 of title 11 of the Bankruptcy Code, staying the DPOA’s processing of the Hall Claim; and

WHEREAS, the Hall Claim was included in Claim No. 1869, the omnibus protective claim filed by the DPOA on February 20, 2014 in order to preserve DPOA

members' rights with regard to grievances filed by the DPOA on behalf of its members;

WHEREAS, on October 1, 2014, the City and the DPOA entered into a collective bargaining agreement (the "DPOA CBA");

WHEREAS, on October 22, 2014, the City filed the Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014) [Doc. No. 8045] ("Plan"), which Plan incorporated the DPOA CBA and became effective on December 10, 2014 ("Effective Date"); and

WHEREAS, the Parties believe that a consensual resolution of the Hall Claim is in the best interest of the Parties;

WHEREAS, the material terms of the Parties' resolution are set forth on Exhibit B and are further memorialized in the Order attached hereto as Exhibit A;

NOW THEREFORE, the Parties consent to the entry of the Order attached hereto as Exhibit A, granting Hall a Class 15 Convenience Claim under the Plan in the amount of \$25,000 ("Settled Claim") in order to resolve all of Hall's and the DPOA's claims against the City arising out of the Hall Claim. The Parties agree that, except for the relief granted herein, the City is released of any further obligation to Hall or the DPOA arising out of the Hall Claim. The Parties further agree (a) that the Settled Claim shall be treated in accordance with Class 15 of the Plan, (b) the distribution on the Settled Claim will be paid to Hall in care of the DPOA, and (c)

DPOA Claim No. 1869 will be modified to withdraw the Hall Claim, which will be replaced by the Settled Claim.

STIPULATED AND AGREED:

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EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
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Hon. Thomas J. Tucker

**ORDER GRANTING JUAN HALL AN ALLOWED UNSECURED
CONVENIENCE CLAIM IN THE AMOUNT OF \$25,000**

This matter is before the Court on the Stipulation for Entry of an Order Granting Juan Hall an Allowed Unsecured Convenience Claim in the Amount of \$25,000 and for Other Relief (the “Stipulation”)¹ filed by the City of Detroit (“City”), and the Detroit Police Officers Association (“DPOA”) and Juan Hall (“Hall”). The Court has reviewed the Stipulation and Exhibit B thereto, is otherwise fully advised in the premises and finds just cause for the relief granted herein:

THEREFORE, IT IS HEREBY ORDERED that Hall is granted an allowed Convenience Claim under the Plan in the amount of \$25,000, which shall be treated in accordance with Class 15 of the Plan (“Settled Claim”).

¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Stipulation.

IT IS FURTHER ORDERED that the distribution on the Allowed Claim will be paid to Hall in care of the DPOA.

IT IS FURTHER ORDERED that DPOA Claim No. 1869 is modified to withdraw the Hall Claim.

IT IS FURTHER ORDERED that, except for the relief granted by this Order, all of Hall's and the DPOA's Claims against the City arising from or related to the Hall Claim are hereby released and resolved.